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Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

LINZI KAYLENE ADAMS,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:24-cv-03198-SCR

STIPULATION AND PROPOSED ORDER
FOR EXTENSION OF TIME TO FILE THE
ELECTRONIC CERTIFIED
ADMINISTRATIVE RECORD AS THE
ANSWER TO PLAINTIFF'S COMPLAINT

Pending the Court's approval, the parties stipulate through their respective counsel that Defendant, the Commissioner of Social Security (the "Commissioner"), shall have a thirty-day extension of time to respond to Plaintiff's Complaint in this case from January 27, 2025, up to and including February 26, 2025. In support of this request, the Commissioner respectfully states as follows:

1. Defendant's response to Plaintiff's Complaint is due to be filed by January 27, 2025.

- 1 Defendant has not previously requested an extension of this deadline.
- 2 2. In accordance with the Federal Rules of Civil Procedures, recently amended to add
- 3 Supplemental Rules for Social Security review cases under 42 U.S.C. § 405(g), the
- 4 Commissioner files a certified administrative record (CAR) as the Answer to a
- 5 Complaint for review.
- 6
- 7 3. Counsel for the Commissioner has been informed by the client agency, which is the
- 8 Social Security Administration, Office of Appellate Operations, that the CAR is not
- 9 fully prepared in this matter. The client agency therefore needs more time to prepare
- 10 the CAR for the Court's review.
- 12 4. For this reason, Defendant requests an extension to February 26, 2025 (30 days), to
- 13 file an Answer or other response in this matter.
- 14
- 15 5. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that
- 16 he has no objection to this extension request.
- 17 6. This request is made in good faith and is not intended to delay the proceedings in this
- 18 matter.
- 19 7. I am attempting to preserve limited judicial resources and have applied the most rapid
- 20 response under the circumstances.

21 WHEREFORE, Defendant requests until February 26, 2025, to respond to Plaintiff's

22 Complaint.

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Respectfully submitted,

DATE: January 23, 2025

Law Offices of Francesco Benavides

/s/ Francesco Paulo Benavides*

FRANCESCO PAULO BENAVIDES

Attorney for Plaintiff

(*as authorized via email on January 23, 2025)

MICHELE BECKWITH

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MATHEW W. PILE

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Office of Program Litigation, Office 7

Social Security Administration

DATE: January 23, 2025

By s/ Justin L. Martin

JUSTIN L. MARTIN

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to stipulation, it is so ordered.

DATE: January 23, 2025



SEAN C. RIORDAN

UNITED STATES MAGISTRATE JUDGE